

## **FACT SHEET**

### **INTERIM MEASURES PLAN POLES INC. – OLDTOWN EPA ID No. IDD009061714**

The purpose of this Fact sheet is to set forth the principle facts pertaining to a draft Interim Measures Plan (Plan) that the Department of Environmental Quality (DEQ) is proposing to approve for Poles Inc. The Plan proposes to clean up residual soil contamination, consolidate the contaminated soils, then cap and cover the consolidated soil and monitor the ground water beneath the facility. The Plan specifies design and closure of the Hazardous Waste Management Act (HWMA) regulated unit and interim monitoring requirements for the Poles Inc. facility located in Oldtown, Idaho.

The regulatory basis for the conditions/requirements of the Plan can be found within the Rules and Standards for Hazardous Waste, IDAPA 58.01.05.004 through 58.01.05.013 [40 CFR Parts 124, 260 through 266, 268, and 270]. This fact sheet was prepared in a manner that complies with the requirements of IDAPA 58.01.05.013 [40 CFR § 124.8].

#### **A. PURPOSE OF THE INTERIM MEASURES PLAN**

The purpose of an interim measures plan is to identify specific administrative, regulatory and procedural requirements, under which a facility will operate, to comply (or come into compliance) with the Hazardous Waste Management Act of 1983, as amended, and regulations promulgated thereunder by DEQ.

The proposed Interim Measures Plan sets forth, in one concise document, all the applicable requirements that DEQ intends to require the Poles Inc. to comply with during, and subsequent to, cleanup of the pole yard and construction of the cap over the consolidated soils. DEQ is proposing to approve the Plan. The public is given forty-five (45) calendar days to review and comment on the Plan prior to DEQ taking any final action (approval, modification, or denial) on the Plan. The comment period will begin on December 10, 2004 and end at 5 p.m. on January 24, 2005.

The proposed Plan was prepared by Poles Inc. and submitted to DEQ on November 22, 2004. The Plan includes cleanup and consolidation of contaminated media, capping of the consolidated media, and ground water monitoring at the facility. The Plan, supporting data provided by the applicant, and all other documents retained by DEQ in support of the Plan are available for review at the Boise Office of DEQ.

#### **B. PROCEDURES FOR REACHING A FINAL DECISION**

IDAPA 58.01.05.009 [40 CFR § 265.112(d)(4)] requires the Public be given thirty (30) days to comment on the Plan. DEQ is providing for a forty-five days comment period because of public interest and the holidays. The initial comment period will begin on December 10, 2004 and end at 5 p.m. on January 24, 2005. Further, DEQ may, in response to a request or at the discretion of the Director, hold a public hearing whenever such a hearing may clarify on or more issues concerning the draft plan. Any person interested in commenting on the Plan must do so within the time frames of the comment period. The entire Plan is open for public comment.

All persons wishing to comment on the proposed draft Plan should submit comments in writing to:

Mr. Robert Bullock  
c/o Ms. Teri Gregory  
Waste Management and Remediation Division  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706-1255  
(208) 373-0502

Comments should include all reasonable references, factual grounds, and supporting material. When making the final determination regarding the approval of this Plan, DEQ will consider all written comments received during the public comment period, those received during any public hearing, the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 et seq., and all other applicable federal, state, or local laws.

### **C. FACILITY DESCRIPTION**

The facility, a former pole treatment site using pentachlorophenol, is located in Oldtown Idaho. Oldtown is situated along the Idaho/Washington border and shares a common border with the city of Newport, Washington. The site consists of approximately 19 acres, located on a terrace on the south side of the Pend Oreille River. The site is bordered on the west by highway 41, the north by low-density residential and commercial properties and the south by an active Burlington Northern Railroad right-of-way.

The purpose of the Plan is to cleanup and consolidate contaminated soil on the site and place a permanent cover over the consolidated soils, eliminating direct exposure of the public to potentially hazardous compounds. The cover will also minimize or eliminate migration of waste constituents through the soil column to the ground water. The ground water will be monitored for known hazardous constituents to determine if the contaminated soils are having a detrimental effect on ground water quality downgradient of the facility. Associated with the Plan, DEQ has issued a HWMA/RCRA Part B Permit Application call-in to Poles Inc. The Part B Permit Application and, when approved, the HWMA/RCRA Part B Post-Closure Care Permit will be the mechanism by which the monitoring, inspection and maintenance activities are enforced.

### **D. CHRONOLOGY OF REGULATORY ACTIONS**

An initial site investigation of the facility was performed by the EPA in 1980. In 1984, a Preliminary Assessment (PA) was performed by the Idaho Department of Health and Welfare (IDHW). As a result of the PA, another site investigation was performed by EPA in 1988. The DEQ performed a Compliance Evaluation Inspection in 2000 and the IDHW, Bureau of Environmental Health and Safety performed an evaluation of potential pentachlorophenol air contamination in 2001. Additionally, EPA performed an Integrated Assessment Report in 2001.

In July 2002, DEQ issued a Consent Order requiring characterization and remediation at the facility if necessary. Based on the characterization results, it was determined that the Poles Inc. facility could not be clean closed. As a result, DEQ terminated the Consent Order and issued a RCRA Part B Permit call-in on August 20, 2003. The subsequent Permit Application is currently under review by DEQ and interim measures are being proposed to mitigate potential exposures to hazardous compounds.